

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:) Chapter 11
)
PRINTERS ROW, LLC,) Honorable Eugene R. Wedoff
) Case No.: 08-17301
Debtor.)

**NOTICE OF HEARING ON FINAL FEE APPLICATION OF ICE MILLER LLP FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
INCURRED AS COUNSEL FOR THE DEBTOR**

PLEASE TAKE NOTICE that on June 29, 2010 at 9:30 a.m., we shall appear before the Honorable Eugene R. Wedoff, in the courtroom usually occupied by him in the Everett McKinley Dirksen Building, 219 South Dearborn Street, Chicago, Illinois 60604, or before any other judge who may be sitting in his place and then and there shall present *Final Fee Application of Ice Miller LLP for Allowance of Compensation and Reimbursement of Expenses Incurred as Counsel for the Debtor* (the "Final Fee Application"), a copy of which is attached hereto and hereby served upon you.

PLEASE TAKE NOTICE that, pursuant to the Final Fee Application, Ice Miller LLP seeks to have \$321,714.10 in fees and \$3,937.86 in expenses allowed.

PLEASE TAKE FURTHER NOTICE that any party wishing to object to the Final Fee Application shall file such objection with the Clerk of the United States Bankruptcy Court and deliver such objection to the undersigned counsel for the Debtor. If you do not object to the relief requested, an Order may be granted approving the relief requested.

Dated: June 7, 2010

Respectfully submitted,

ICE MILLER LLP

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**FINAL FEE APPLICATION OF ICE MILLER LLP FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED AS
COUNSEL FOR THE DEBTOR**

Ice Miller LLP ("Ice Miller") for its *Final Fee Application of Ice Miller LLP for Allowance of Compensation and Reimbursement of Expenses Incurred as Counsel for the Debtor* ("Application"), respectfully states the following:

Factual Background and Jurisdiction

1. On July 3, 2008 (the "Petition Date"), the Debtor filed a voluntary Petition under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code"). On May 12, 2010, this Court entered an *Order Confirming Debtor's First Amended Plan of Reorganization as Immaterially Modified*, pursuant to which the Debtor's *First Amended Plan of Reorganization*, as amended and/or immaterially modified was confirmed.

2. On November 26, 2008, the Debtor filed its *Application for Order Authorizing Debtor to Employ Ice Miller LLP as Counsel for the Debtor*.

3. On December 2, 2008, this Court entered an *Order Authorizing the Debtor to Employ Ice Miller as Counsel* ("Retention Order"), wherein the Court authorized the employment of Ice Miller and granted administrative expense priority, as allowed by the Court, to the fees and expenses incurred by Ice Miller in representing the Debtor.

4. During the pendency of the Debtor's Chapter 11 proceeding, Ice Miller has filed four interim applications seeking the approval of fees and expenses. By Order entered May 13, 2009, Ice Miller's first interim application for approval of fees and expenses for the period of November 4, 2008 to January 31, 2009 was approved – allowing a total of \$45,613.00 in fees and \$294.05 in expenses. By Order entered September 10, 2009, Ice Miller's second interim application for approval of fees and expenses for the period of February 1, 2009 to April 30, 2009 was approved – allowing a total of \$53,456.60 in fees and \$3.60 in expenses. By Order entered December 9, 2009, Ice Miller's third interim application for approval of fees and expenses for the period of May 1, 2009 through July 31, 2009 was approved – allowing a total of \$47,332.50 in fees and \$1,430.48 in expenses. By Order entered March 10, 2010, Ice Miller's fourth interim application for approval of fees and expenses for the period of August 1, 2009 through September 30, 2009 was approved – allowing a total of \$94,391.50 in fees and \$1,179.34 in expenses.

5. This Court has jurisdiction over the Application pursuant to 28 U.S.C. §§ 157 and 1344(b) and the resolution of this Application constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

6. The Court has authority to grant the relief requested in the Application pursuant to 11 U.S.C. §§ 327(e), 330, and 331.

Request for Compensation and Reimbursement of Fees and Expenses

7. By this Application, Ice Miller respectfully requests that this Court approve the allowance and payment of all fees and expenses incurred by Ice Miller from November 4, 2008 through May 12, 2010 (the “Fee Period”).

8. Pursuant to the Retention Order, Ice Miler has provided a variety of necessary services to the Debtor during the Fee Period, including, but not limited to, the following:

- (a) Business Operations. Advised the Debtor generally on matters related to its ongoing operations, including work on addressing ongoing operational issues, ensuring compliance with applicable license regulations, and advised the Debtor with respect to its rights and obligations as a Debtor-in-Possession under Chapter 11 of the Bankruptcy Code.
- (b) Case Administration. Assisted the Debtor in complying with reporting requirements, reviewed and analyzed all pleadings filed in the Debtor's case as well as the correspondence and other documents received on an ongoing basis from numerous parties-in-interest, and attended to all administrative matters related to the Debtor's proceeding.
- (c) Claims Administration and Objections. Assisted the Debtor in evaluating, analyzing, and objecting to claims asserted against the estate. As a part of the performance of these services, assisted the Debtor in addressing tax claims, alleged secured claims, insider claims, and general unsecured claims filed in the Debtor's case.
- (d) Fee/Employment Applications and Objections. Addressed all issues related to professional fees of the estate.
- (e) Financing. Assisted the Debtor in complying with the terms of the Debtor-in-Possession Financing approved by the Court and in evaluating ongoing financing issues
- (f) Plan and Disclosure Statement. Assisted the Debtor in the evaluation of options for a Plan of Reorganization, assisted the Debtor in the pursuit of a Chapter 11 Plan of Reorganization, in obtaining approval for procedures related to the solicitation of acceptances and rejections related to such proposed Plan, and in obtaining confirmation of a Chapter 11 Plan.
- (g) Litigation. Assisted the Debtor in the evaluation and pursuit of causes of action, assisted in the process of litigating matters related to the operation of the Debtor's business operations, and the pursuit of the Debtor's rights as a debtor-in-possession.

The above descriptions serve as a general summary of the services provided by Ice Miller and are intended only to highlight areas of particular importance in this case. Ice Miller's statements related to the time period since the cut-off of the Fourth Interim Fee Application filed by Ice

Miller are attached hereto as **Exhibit A** and Ice Miller's billing statements for the remaining portions of Fee Period have been previously filed with the Court as attachments to the four Interim Applications filed herein.

9. The amount of fees incurred during the Fee Period for which Ice Miller seeks compensation is Three Hundred Twenty-One Thousand, Seven Hundred Fourteen and 10/100 Dollars (\$321,714.10). A total of Eighty Thousand, Nine Hundred Twenty and 50/100 Dollars (\$80,920.50) in fees relate to the time period since the cut-off of the Fourth Interim Fee Application filed by Ice Miller and approved by the Court (specifically, between October 1, 2009 and May 12, 2010).

10. The following Ice Miller attorneys and paralegals rendered services to the Debtor during the Fee Period¹:

Attorney	Admission Date	Hours	Rate	Total
Ben Caughey	2001	343.8	\$320.00	\$110,966.00
John Burke	1990	264.8	\$425.00	\$110,742.50
Michelle Fisk	2000	200.9	\$350.00	\$70,315.00
Douglas Henning	2005	64.9	\$285.00	\$18,034.50
John Thompson	2008	28.0	\$205.00	\$5,240.00
Jill Koehlinger	2008	17.5	205.00	\$3,587.50
Henry Efroymson	1982	7.8	\$450.00	\$3,505.00
Erik Long	2009	17.5	\$185.00	\$3,237.50
Zeff Weiss	1983	6.0	495.00	\$2,970.00

¹ The aggregate total of the fees incurred by the denoted attorneys and paralegals exceeds the total Ice Miller seeks to have allowed due to courtesy discounts provided by Ice Miller.

Jeffery Dack	2007	11.4	245.00	\$2,793.00
Josh Christie	2006	10.5	225.00	\$2,362.50
Sherri DeFilippis	Paralegal	12.1	\$175.00	\$2,117.50
Thomas Schnellenberger	1979	4.2	\$425.00	\$1,785.00
Mark Baggio	1986	3.0	395.00	\$1,185.00
Paul M. Jones	2002	3.0	285.00	\$855.00
Emmanuel Boulukos	2008	3.8	205.00	\$779.00
David Hight	1985	1.9	\$395.00	\$750.50
Michael H. Boldt	1975	1.2	380.00	\$456.00
Michael Buker	1998	1.2	\$350.00	\$420.00
James Augustyn	2008	1.4	\$205.00	\$287.00
James Betley	2007	1.3	\$205.00	\$266.50

11. Ice Miller's billing statements, set forth in detail the nature of the legal services rendered by Ice Miller, the dates on which Ice Miller's personnel rendered such legal services, the identity of Ice Miller's attorneys and paralegals who performed such legal services, the time spent by each of Ice Miller's personnel in performing such legal services, and the amount of fees attributable to each such legal service performed by Ice Miller's attorneys and paralegals.

12. Ice Miller's billing statements provide the hours spent by the professionals for whom compensation is sought, reflect the hourly rate charged for each of the professionals, and break time and expenses out into matters related to well-defined categories of services. The hourly rates charged by Ice Miller for legal services are identical to the rates generally charged by Ice Miller to its non-bankruptcy clients. Throughout most of the Fee Period, Ice Miller has

kept its rates for attorneys and paralegals at the rates effective for calendar year 2008. In addition, Ice Miller has not charged for travel time and expenses and has provided certain courtesy discounts to the Debtor, which as more fully set forth in the Interim Fee Applications, aggregate to approximately \$24,000.00.

13. During the Fee Period, as itemized and summarized in **Exhibit A** and the prior billing statements filed with the Court, Ice Miller incurred expenses in connection with its representation of the Debtors totaling Three Thousand, Nine Hundred Thirty-Seven and 86/100 Dollars (\$3,937.86). A total of One Thousand, Thirty and 39/100 Dollars (\$1,030.39) in expenses relate to the time period since the cut-off of the Fourth Interim Fee Application filed by Ice Miller and approved by the Court (specifically, between October 1, 2009 and May 12, 2010). Ice Miller submits that each expenditure was a necessary and reasonable cost incident to the performance of Ice Miller's services for the Debtor.

14. Ice Miller submits that, pursuant to Section 330 of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and the Retention Order, it is entitled to compensation and reimbursement for the fees and expenses set forth in this Application. Ice Miller's services are properly compensable, were actual and necessary expenses of the administration of the estate, and have aided in the administration of the case and helped the Debtor fulfill its duties under the Bankruptcy Code.

WHEREFORE, Ice Miller requests that the Court enter an Order approving the Application and:

(A) Allowing compensation to Ice Miller in the sum of Three Hundred Twenty-One Thousand, Seven Hundred Fourteen and 10/100 Dollars (\$321,714.10) representing compensation for legal services rendered during the Fee Period;

(B) Allowing Ice Miller the sum of Three Thousand, Nine Hundred Thirty-Seven and 86/100 Dollars (\$3,937.86) as reimbursement for out-of-pocket expenses incurred during the Fee Period as a result of its representation of the Debtor; and

(C) Granting such other relief as is just and proper.

Dated: June 7, 2010

Respectfully submitted,

ICE MILLER LLP

By: /s/ Ben T. Caughey

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